

1 **Production Request No. 14:** Please produce all documents, including medical records and
2 notes, relating to any treatment, counseling or observation for a disorder of any kind, including
3 but not limited to a mental condition, alcoholism, or narcotic addiction, whether or not caused
4 by any action or inaction of PSS or its employees.

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6 **Response to Document Request No. 14:** Plaintiff objects to this request as it does not seek
7 information admissible at trial or information reasonably likely to lead to the discovery of
8 information admissible at trial, vague, overly burdensome and grossly invasive into Plaintiff's
9 private matters unrelated to this lawsuit. Without waiving such objections, Plaintiff does not
10 retain her medical records, but will sign any reasonable release that will enable PSS to gather
11 documents relevant to the claims and defenses in this suit provided that a copy of any
12 documents copied from Plaintiff's medical records and retained by PSS is given to Plaintiff.
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15 **Production Request No. 15:** Please produce all documents relating to your work or
16 performance for any employer, including but not limited to all documents contained in
17 personnel files. Please include performance appraisals or evaluation, any documents related to
18 resignation from employment or any adverse employment action initiated or taken against you,
19 including letters of reprimand, letters regarding any failure to perform or negative attitude,
20 performance appraisals, termination or resignations from employment.

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22 **Response to Document Request No. 15:** Plaintiff objects to this request as it does not seek
23 information admissible at trial or information reasonably likely to lead to the discovery of
24 information admissible at trial, vague, overly burdensome and grossly invasive into Plaintiff's
25 private matters unrelated to this lawsuit. Without waiving such objections, Plaintiff does not
26 have within her custody and/or control copies of former employers' personnel files and other
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1 documents. However, Plaintiff has conducted a reasonable search of her personal documents
2 and produces what documents she has been able to locate within her custody and/or control
3 responsive to this request by attaching them to these responses. Specifically, Plaintiff has
4 provided letters of employment, employment records, pay records and cancelled checks that
5 related to some of her past employment.
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8 **Production Request No. 16:** Please provide all documents relating to any other litigation that
9 you have been involved as either a plaintiff or defendant.

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11 **Response to Document Request No. 16:** Plaintiff objects to this request as it is overly
12 broad (in that it seeks documents not in the custody and/or control of Plaintiff) and overly
13 burdensome (as it lacks any temporal or geographic limit in its scope), vague (as the term
14 "litigation" is undefined and capable of more than one interpretation) and does not seek
15 information admissible at trial or calculated to lead to the discovery of admissible information.
16 Without waiving the aforementioned objections, Plaintiff has no responsive documents within
17 her custody and/or control.
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20 Date: August 3, 2006.

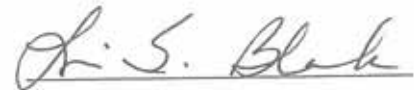
21 O'CONNOR BERMAN DOTTS & BANES
22 Attorneys for Plaintiff Lisa Black
23

24
25 By: 
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27 MICHAEL W. DOTTS (F0150)
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1 I, Lisa Black, hereby declare under the penalty of perjury that I have read the foregoing
2 responses and, based on our investigation and discovery to date and my review of records and
3 statements by CNMI Public School System employees and staff, these responses are true and
4 correct.
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7 Dated this 31st day of July, 2006.
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11 Lisa Black
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